

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

GEORGE A. JACKSON, et al., :
Plaintiffs, :
v. : Civil Action No. 05-823-*** (MPT)
STANLEY TAYLOR, et al., : REQUEST FOR ADMISSIONS
Defendants. :
:

REQUEST FOR ADMISSION, SET NUMBER 17 ARE PROPOUNDED
TO: Defendants Michael Knight and Chris Senato
BY: Plaintiff George A. Jackson

YOU ARE HEREBY REQUIRED TO ADMIT the truthfulness of
the facts set forth below; and the genuineness of each document, a copy of
which is attached to this Request.

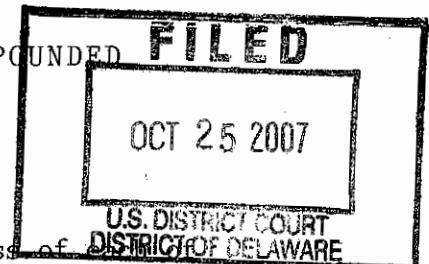
EACH OF THE FOLLOWING FACT IS TRUE:

1. Heating, ventilation, and air condition (HVAC), related processed
designed to regulate ambient conditions within buildings for comfort or for
industrial purpose.

2. Heating an area raises temperature in a given space to a more
satisfactory level than that of the atmosphere.

3. Ventilation, either separately, or in combination with the heating
or air condition system, controls both the supply and exhaust of air within
given areas in order to provide sufficient oxygen to the occupants and to
eliminate odors.

4. Air conditioning designates control of the indoor environment year-round to create and maintain desirable temperature, humidity, air circulation,
and purity for the occupants of that space or for the industrial materials
that are handled or stored there.



5. Plaintiff George A. Jackson's July 19, 2005 grievance, was filed as an "Emergency Grievance" and received by the SCI Warden's Office on July 20, 2005.

6. On July 20, 2005, SCI Food Service staff filed an report pertaining to contaminated Beef Cube Steak being discovered by inmate during his dinner meal.

7. Food Service Supervisor Joseph Adkins carried out an investigation which included an inspection of the kitchen area.

8. The SCI main kitchen area was found to be well maintained.

9. The source of the contamination could not be conclusively determined.

10. Prior to July 2005, the east and west alcove doors of the SCI main kitchen were not self-closing doors.

11. Former inmate kitchen worker Joshua Hudson, suffered a serious injury to his fingers when one of the SCI main kitchen alcove doors slammed against his fingers while in the door frame in 2006.

12. DOC maintenance crew repair both east and west alcove doors to become self-closing after the injury of Joshua Hudson.

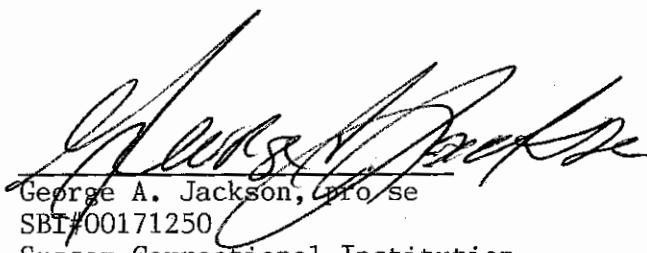
13. Plaintiffs' original complaint and amended complaint, both alleged; "contaminated food being sent out to the prison population."

14. During the hot summer months when temperature rise and/or exceeds 100 degree, inmate kitchen workers are instructed to drink plenty of water (or liquid).

15. Consequences of drinking excessive water or liquids would prompt individuals to increase more trips to a bathroom to relieved themselves.

16. SCI main kitchen only has one(1)toilet seat in the inmate bathroom for 22-25 inmate kitchen workers per shift.

17. Defendants Knight and Senato both do not maintain any certification records of frequent and regular inspection of the SCI main kitchen and equipment.



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